

# Ethics: Critical Next Steps

## UNITED STATES OFFICE OF GOVERNMENT ETHICS

Preventing Conflicts of Interest  
in the Executive Branch

## WAYS THE U.S. OFFICE OF GOVERNMENT ETHICS (OGE) CAN HELP

- ❖ Briefings before and after the election
- ❖ Training on *INTEGRITY* (e-filing system)
- ❖ Review of financial disclosure reports
- ❖ Consultations on prospective nominees
- ❖ Technical assistance with ethics initiatives
- ❖ Guidance on government ethics

### Illustration of Nominee Financial Disclosure Process



### Key Dates and Critical Action Items for the Transition Team

AUGUST	☆ Receive OGE Briefing
SEPTEMBER	☆ Commit Staff to Train on <i>INTEGRITY</i>
	☆ Complete Technical Set-Up in <i>INTEGRITY</i>
OCTOBER	☆ Recruit a Government Ethics Expert
NOVEMBER	☆ Hire an Ethics Lead
	☆ Establish Procedures for Communication
	☆ Start Nominee Review Process for Priority Positions
DECEMBER	☆ Continue Nominee Process for Priority Positions

### Description of Nominee Financial Disclosure Process

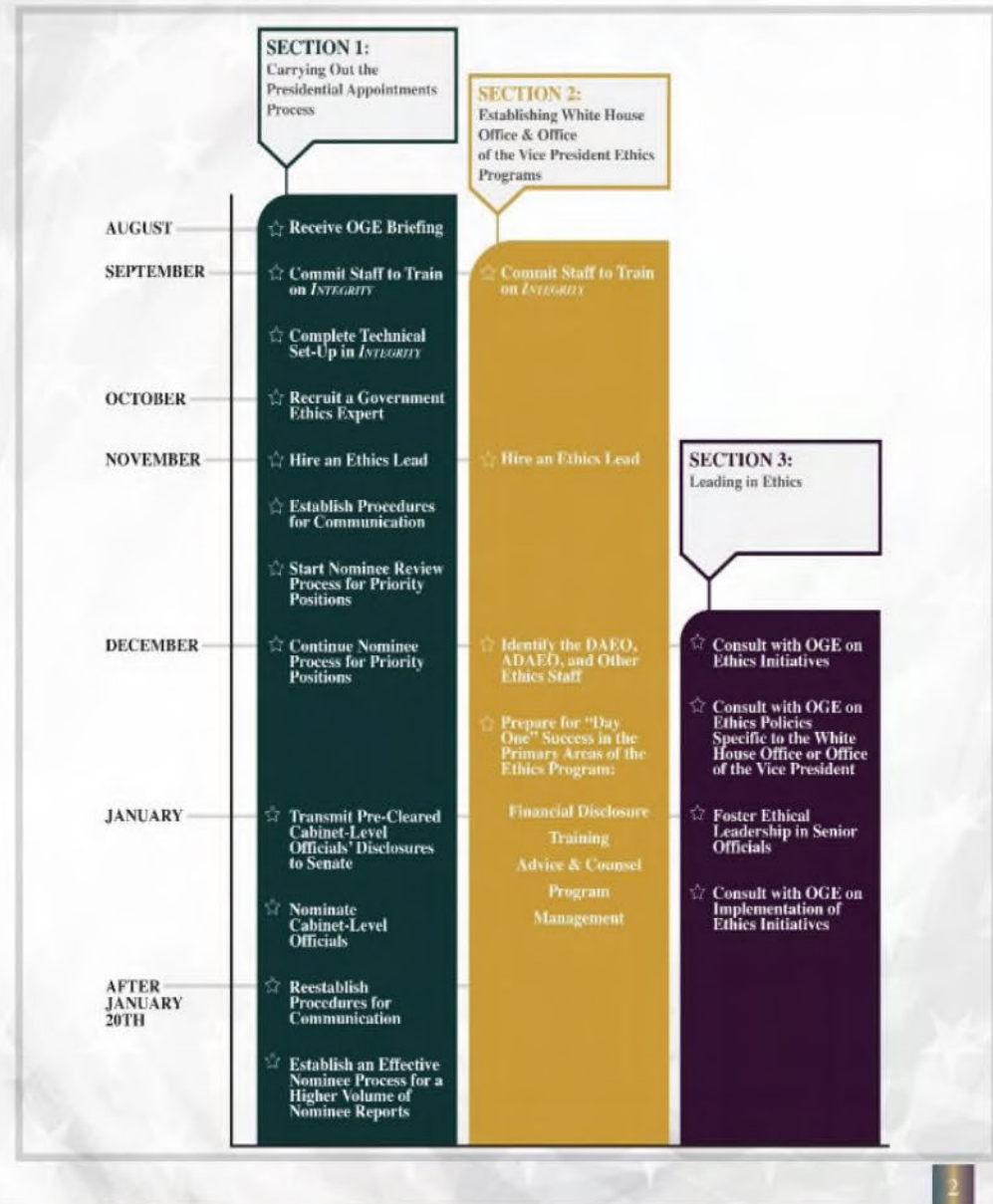
Transition Team provides *Nominee Guide* to nominee • Transition Team initiates financial disclosure report in *INTEGRITY* • Release report to OGE and the agency • OGE/agency work on report with nominee (multiple rounds over several weeks) • OGE/agency draft ethics agreement • OGE “preclears” report • Public intent to nominate • Senate holds hearings before Inauguration

## ADDRESSING RISK FACTORS

- **Risk: Too little time to clear reports before Inauguration**  
Send OGE as many reports as possible in November and early December
- **Risk: Slow responses from nominees**  
Emphasize the importance of responding promptly to questions about their reports
- **Risk: Nominees’ resistance to resolving conflicts of interest**  
Advise nominees early in the process that they and their spouses may be required to divest assets
- **Risk: Confidentiality concerns**  
*INTEGRITY* is a secure system with limited access and role-based permissions
- **Risk: Issues arising from the complexity of ethics rules and the nominee process**  
Detail an agency ethics official or hire an outside financial disclosure expert

# Ethics: Critical Next Steps

## OVERVIEW OF KEY DATES AND CRITICAL ACTIONS



### A Roadmap to Presidential Appointments, Ethics Program Administration, and Ethical Leadership (2024)

# Ethics: Critical Next Steps

## Receive OGE Briefing

After the nominating convention, OGE's Leadership team will hold a briefing for Presidential Transition Team (PTT) officials to provide critical information and to establish procedures for interactions going forward, especially regarding potential Presidential nominees subject to Senate confirmation. To set up the briefing, please email [PresidentialTransition@oge.gov](mailto:PresidentialTransition@oge.gov).

## Commit Staff to Train on *INTEGRITY*

Since 2015, *INTEGRITY* has successfully served as the executive branchwide public financial disclosure filing system. *INTEGRITY*, a secure, confidential, web-based system, assists nominees in navigating the complex financial disclosure requirements and allows nominees to add a Filer Designee, a third-party representative, to assist in completing the report.

To use *INTEGRITY* effectively, the PTT must commit at least four staff to manage the system. The staff members should be the individuals:

- o who will assign financial disclosure reports to potential PAS nominees, review the reports for potential ethics issues, and interact with OGE and the agencies regarding nominee reports;
- o who will have positions in the Presidential Personnel Office (PPO) and the White House Counsel's Office (WHCO) focused on nominees after the inauguration; and
- o who will commit significant time to training and practice prior to the election.

The designated four staff members must:

- o attend multiple training sessions,
- o practice on the *INTEGRITY* training system, and
- o transition as post-election and post-inauguration staff to retain the expertise.

## Complete Technical Set-Up in *INTEGRITY*

At least two PTT staff (of the four trained above) must be assigned to work with OGE to complete the technical set up of the PTT's *INTEGRITY* filing process for nominees. They must:

- o be working for the PTT post-election and the White House post-inauguration;
- o be responsible for nominee work in the post-election period; and
- o fill administrator roles in *INTEGRITY*.

If any of the four people who are trained leaves the transition team, the PTT must identify a replacement to be trained immediately. Delays in identifying a replacement will delay the ability of the PTT to access the *INTEGRITY* system.

## [A Roadmap to Presidential Appointments, Ethics Program Administration, and Ethical Leadership \(2024\)](#)

### THE TECHNICAL SET-UP CREATES THE WORKFLOW FOR PAS NOMINEES DESCRIBED BELOW:

**Transition Team:** The PTT emails the prospective nominee OGE's "Nominee Guide."

**Transition Team:** A PTT member assigned to the "PPO" role in *INTEGRITY* registers the prospective nominee in *INTEGRITY* and initiates a financial disclosure report. If the PTT has set up the "notice" feature in *INTEGRITY*, *INTEGRITY* will automatically email the prospective nominee a notice with instructions.

**Nominee:** The prospective nominee completes a draft financial disclosure report in *INTEGRITY* and submits it to the PTT by clicking the "submit" button.

**Transition Team:** The PTT member assigned to the "PPO" role in *INTEGRITY* releases the report to the PTT member assigned to the "WHCO" role in *INTEGRITY*.

**Transition Team:** The PTT member assigned to the "WHCO" role in *INTEGRITY* releases the report through *INTEGRITY* to OGE and to the prospective nominee's agency.



# Ethics: Critical Next Steps

Visit and use the resources available on  
OGE's [Election Readiness Webpage](#)

## Transition Teams

### [A Roadmap to Presidential Appointments, Ethics Program Administration, and Ethical Leadership \(2024\)](#) (PDF)

This guide is divided into three distinct parts, each of which describes key actions that the PTT, then the White House Office and Office of the Vice President, must take to ensure a smooth transition regarding government ethics. Each section is organized by the three key time periods that occur during an election cycle: pre-election; post-election; and post-inauguration and describes the top actions the PTT and then the incoming Administration should take, provides the associated timeline for the action, and explains why these actions are critical. The end of each section contains useful reference information.

### [Ways OGE Can Help in the Presidential Transition \(1-page graphic\) \(2024\)](#) (PDF)

This one-page resource describes the ways OGE can assist a Presidential Transition Team.

### [Quick Guide to PAS Reports Reviewed by OGE \(2024\)](#) (PDF)

This Quick Guide describes which PAS reports are or are not subject to OGE review.

### [\(Unofficial\) Excel Workbook of PAS Nominee Positions Subject to OGE Financial Disclosure Review \(2024\)](#) (excel)

This Workbook lists the civilian PAS positions traditionally subject to OGE's review in the nomination process. *Note:* The official source for identifying political positions in the executive branch is the publication titled, "United States Government Policy and Supporting Positions." This publication, commonly known as the Plum Book, is published alternately by the Senate and the House committees after each Presidential election. OGE publishes the list of PAS positions subject to its review to complement this publication.

## Prospective Presidential Nominees

### [Guide for Nominees \(2024\)](#) (PDF)

The Guide is for prospective nominees to PAS positions and those confirmed to these positions. It is organized to take a nominee through the life cycle of a person who will serve as a Senate-confirmed Presidential appointee (PAS official). It includes sections explaining what to expect during the nominee process, how to have an ethical start to Federal service, how to be a leader in ethics, and what to consider when planning to leave Federal service. The appendix contains detailed reference information, such as instructions for integrity and financial disclosure checklists.

Contact OGE to schedule the detailed briefing and to  
schedule *INTEGRITY* training.  
Email: [PresidentialTransition@oge.gov](mailto:PresidentialTransition@oge.gov)